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July 20, 2015

Via ECF and Facsimile

The Hon. Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East
Chambers Room 1230
Brooklyn, New York 11201

Re: *XYZ Two Way Radio Service Inc., et al. v. Uber Technologies, Inc., et al.*,
No. 1:15-cv-03015-FB-CLP

Dear Judge Pollak:

We write on behalf of all parties in the above-captioned action.

The parties participated in a Rule 26(f) conference. Pursuant to Federal Rule of Civil Procedure 26(f)(2) and the Court's Order dated May 29, 2015 [Dkt No. 16], the parties respectfully submit the enclosed Initial Conference Questionnaire setting forth the proposed discovery plan to which the parties agreed at that time. Defendants reserve their right to seek a stay of discovery.

Respectfully submitted,

/s/ Deana Davidian
Deana Davidian

Enc.

cc: All Counsel of Record (via ECF)

INITIAL CONFERENCE QUESTIONNAIRE

1. Date for completion of automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure, if not yet made: JULY 14, 2015
2. If additional interrogatories beyond the 25 permitted under the federal rules are needed, the maximum number of: plaintiff(s) N/A and defendant(s) N/A
3. Number of depositions by Plaintiff(s) of: parties 15 non-parties 5
4. Number of depositions by Defendant(s) of: parties 10 non-parties 5
5. Date for completion of factual discovery: January 21, 2016
6. Expert witnesses:

Anticipated Number of Expert Witnesses:

Plaintiffs: 3-5 (Non-medical)

Defendants: 3-5 (Non-medical)

Opening expert report(s): April 21, 2016

Rebuttal : June 21, 2016

Completion expert discovery: July 21, 2016

7. Time for amendment of the pleadings by:

Plaintiff(s) February 22, 2016

Defendant(s) February 22, 2016

8. Number of proposed additional parties to be joined by plaintiff(s) TBA and by defendant(s) TBA and time for completion of joinder: February 22, 2016
9. Types of contemplated dispositive motions:

plaintiff(s): Motion for Summary Judgment

defendant(s): Motion for Summary Judgment

10. Dates for filing contemplated dispositive motions:

Opening MSJ Motions (simultaneous): September 22, 2016

11. Have counsel reached any agreements regarding electronic discovery? If so, please describe at the initial conference. TO BE DETERMINED
12. Have counsel reached any agreements regarding disclosure of experts' work papers (including drafts) and communications with experts? If so, please describe at the initial conference. TO BE DETERMINED
13. Will the parties *consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (Answer no if any party declines to consent without indicating which party has declined.)

No